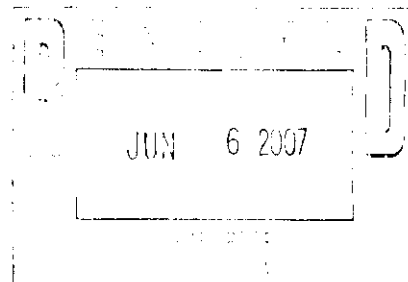


**MEMO ENDORSED**

THE CITY OF NEW YORK  
**LAW DEPARTMENT**

100 CHURCH STREET  
 NEW YORK, NY 10007

MICHAEL A. CARDOZO  
 Corporation Counsel

JESSICA E. COHEN  
 Assistant Corporation Counsel  
 jcohen@law.nyc.gov  
 (212) 788-1895  
 (212) 788-9776 (fax)

June 5, 2007

**BY HAND DELIVERY**

The Honorable Thomas P. Griesa  
 United States District Judge  
 Southern District of New York  
 500 Pearl Street  
 New York, NY 10007

USDC SDNY  
 DOCUMENT  
 ELECTRONICALLY FILED  
 DOC #:  
 DATE FILED: 6/7/07

Re: Lesly Macias a/k/a Nelson Rodriguez v. City of New York, et al.  
 07 CV 3080 (TPG)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and the attorney assigned to the defense of the above referenced matter. I write to respectfully request an enlargement of time from the present day until August 6, 2007 to answer or otherwise respond to plaintiff's complaint on behalf of defendant City of New York. Plaintiff's counsel, Jeffrey Pollack, Esq., consents to this request.

In accordance with this office's obligations under Rule 11 of the Federal Rules of Civil Procedure, we need time to investigate the allegations of the complaint. Plaintiff alleges that, on or about March 8, 2006, at approximately 2:30 a.m., he was "accosted" by members of the New York City Police Department. Plaintiff further alleges he was assaulted and thrown to the ground. As a result of this alleged assault, plaintiff claims that he sustained injuries to his nose, face, head, neck, right arm, torso, and back. Additionally, plaintiff alleges emotional distress, embarrassment, humiliation, and deprivation of his constitutional rights. Accordingly, it is necessary for defendants to acquire as much information as possible concerning this matter in order to properly assess the case and respond to the complaint. To that end, this office is in the process of forwarding to plaintiff for execution a HIPAA compliant medical release so that we can access his medical records.

*Approved*  
*Thomas P. Griesa*  
*USA* 6/6/07

Accordingly, defendant City of New York respectfully requests that its time to respond to the complaint be extended until August 6, 2007. Thank you for your consideration of this request.

Respectfully submitted,



Jessica T. Cohen (JC 0044)  
Assistant Corporation Counsel

cc: Jeffrey Pollack, Esq.  
Tracie A. Sundack & Associates, LLC  
Attorneys for Plaintiff  
19 Court Street, 3<sup>rd</sup> Floor  
White Plains, New York 10601 (by fax)